

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-30060-MAP

JOSEPH F. SCHEBEL, JR.,)
Plaintiff/Pro Se)
)
v.)
)
JOHN MOCCIO, individually and in his official capacity as)
patrolman for the Agawam Police, JOHN KUNASEK, JR.,)
individually and in his official capacity as patrolman for the)
Agawam Police, RICHARD LIGHT, JR., individually and in)
his official capacity as Lieutenant for the Agawam Police,)
JAMES DONOVAN III, individually and in his official)
capacity as Sergeant for the Agawam Police, AGAWAM,)
CITY of INC., which is duly organized under the laws of the)
Commonwealth of Massachusetts is sued herein in its official)
capacity as a corporation under the laws of the Commonwealth,)
RICHARD COHEN, individually and in his official capacity as)
Mayor of Agawam, Massachusetts, ROBERT CAMPBELL,)
individually and in his official capacity as Chief of Police of)
Agawam, Massachusetts,)
Defendants

**DEFENDANTS' PROPOSED STATEMENT IN
PREPARATION FOR SCHEDULING CONFERENCE**

The defendants, by their counsel, file the following proposed statement in accordance with the Notice of Scheduling Conference dated September 28, 2005, Fed. R. Civ. P. 26 and Local Rule 16.1 of the United States District Court of Massachusetts.

PHASE I

I. **Proposed Discovery Plan**

- A. Initial disclosures to be made on or before December 1, 2005.
- B. Written discovery requests to be served by January 1, 2006.
- C. Non-expert depositions to be completed by April 1, 2006.

PHASE II

Following the completion of fact discovery, the defendants request that a status conference be scheduled to determine whether expert discovery is needed and to schedule deadlines for the filing of Rule 56 motions.

II. Proposed Schedule for Filing Motions

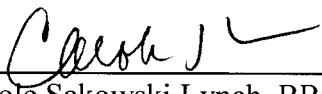
A. All parties will be joined and pleadings will be amended by January 1, 2006.

III. Certifications

The certifications of the parties are submitted under separate cover.

The Defendants,
John Moccio, John Kunasek, Jr., Richard Light,
James Donovan III, City of Agawam, Inc., Richard
Cohen and Robert Campbell

By Their Attorneys
Morrison Mahoney LLP



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I hereby certify that a true copy of the
above document was served upon (each
party appearing pro se and) the attorney
of record for each (other) party by mail
(by hand) on 11/3/05

